

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:

James C. Stephens,

Debtor.

Case No. 09-29970
Chapter 11

**APPLICATION TO APPROVE THE
EMPLOYMENT OF SPECIAL COUNSEL FOR THE DEBTOR**

JAMES C. STEPHENS, Debtor and Debtor-in-Possession, requests that the Court enter an Order authorizing the employment of the Law Offices of Randy Wynn, as counsel under a special retainer under the terms and conditions described in this Application.

1. The Debtor filed a Petition for relief under Chapter 11 of Title 11, United States Code on July 14, 2009, and is operating his business as the Debtor-in-Possession. His business consists of owing, managing, and collecting rents on residential and commercial real property.

2. The Debtor has selected the Law Offices of Randy Wynn as his special counsel, to handle eviction actions, subject to the approval of the Bankruptcy Court.

3. The Debtor has selected special counsel because special counsel has substantial experience in eviction matters, and handled those matters for Debtor prior to the filing of the Petition. The Debtor also desires to hire special counsel, because special counsel's hourly rates are less than Debtor's insolvency counsel.

4. The professional services to be rendered by the special counsel are to prosecute eviction actions and related collections against the defaulting tenants of the Debtor.

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5. It is estimated that special counsel will incur up to \$22,250.00 in fees for six (6) months of work in assisting debtor in eviction matters. Special counsel will bill Debtor for services in connection with Debtor's eviction matters at the rate of \$150.00 per hour.

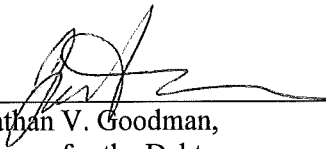
6. The Debtor is requesting a \$22,500.00 fee cap for special counsel.

7. Other than stated in special counsel's *Affidavit of Disinterestedness*, special Counsel is a disinterested party and has no adversity to the Debtor.

Dated: July 29, 2009.

JAMES C. STEPHENS

By: _____


Jonathan V. Goodman,
Attorney for the Debtor

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